Jeffrey Taylor/DC/USEPA/US

TO NCIC HPV@EPA

05/10/2005 03:05 PM

CC

bcc

Subject AR201 -- Commitment Letter -- Verification of

Sponsorship of ICCA HPV Chemicals



Steven_Russell@americanch emistry.com

05/09/2005 08:17 PM

To Diane Sheridan/DC/USEPA/US@EPA, Jeffrey Taylor/DC/USEPA/US@EPA

cc Susan_Lewis@americanchemistry.com, andrew_jaques@americanchemistry.com

Subject Verification of Sponsorship of ICCA HPV Chemicals

OSMAY 13 PM 2: 1.

To: Diane Sheridan, OPPT Jeffrey Taylor, OPPT

From: Steve Russell, ACC

Re: Confirmation of ICCA Commitments for CAS # 109-86-4 and CAS # 629-59-4

I am writing on behalf of the participants in the International Council of Chemical Associations (ICCA) HPV Initiative who are sponsoring the CAS numbers listed above. This email confirms that both chemicals are indeed fully sponsored within the ICCA HPV Initiative. Below are some additional details which we wish to bring to your attention.

CAS # 109-86-4 (EGME) is sponsored by ACC's Ethylene Glycol Ethyl Ether and Ethylene Glycol Methyl Ether Task Group (EE-EM TG), which is comprised of producers in the US, Europe and Japan. A unique aspect of the sponsorship of this chemical is that the sponsors intend to fulfill their commitment by use of the WHO CICAD, which is currently very close to completion, and includes all OECD/SIDS endpoints. US EPA (RAD), the OECD Secretariat, and others have discussed and agree to the procedural aspects of this situation. I am informed by the EE-EM TG that all parties have agreed to this approach.

CAS # 629-59-4 (tetradecane) is currently sponsored in the ICCA HPV Initiative by the International Hydrocarbon Solvents Consortium (IHSC). The IHSC added this chemical to their prior commitments when the previous country sponsor (Italy) dropped their commitment. The US EPA has since agreed to act as the sponsor country. Attached is their letter to EPA with this information.

Thanks for giving us the opportunity to confirm these two commitments.

Regards, Steve Russell

(See attached file: IHSC EPA Sponsorship Ltr 1-05.pdf)

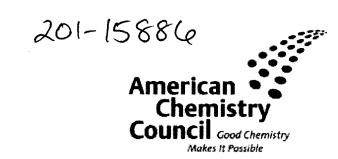
Steven Russell Assistant General Counsel American Chemistry Council

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IHSC EPA Sponsorship Ltr 1-05.pdf



January 14, 2005

Oscar Hernandez, Director Risk Assessment Division (7403) Office of Pollution Prevention and Toxics U.S. Environmental Protection Agency Ariel Rios Building 1200 Pennsylvania Avenue, NW Washington, D.C. 20460 RECEIVED
OPPT CRIC

Re: Request for OECD Program Sponsorship of Decane, Tetradecane and C14-C20 Aliphatic (2-35% aromatic) Hydrocarbon Solvent Category; Clarification of Sponsorship Status

Dear Dr. Hernandez:

The International Hydrocarbon Solvent Consortium (IHSC) is requesting that the U.S. Environmental Protection Agency (EPA) serve as the Organization for Economic Cooperation and Development (OECD) sponsor for decane (CAS no. 124-18-5) and tetradecane (CAS no. 629-59-4). These chemicals have been sponsored in the ICCA Initiative, and until recently the OECD sponsor government was Italy. Italy has recently dropped the sponsorship of these chemicals, and the Italian manufacturer has now joined the IHSC.

The IHSC intends to include decane in the C9-C13 Aliphatic (<2% aromatic) Hydrocarbon Solvents category and tetradecane in the C14-C20 Aliphatic (<2% aromatic) Hydrocarbon Solvents category. Initial test plans for both of these categories, including available information on decane and tetradecane, have already been submitted to the Agency for review. The IHSC understands that there may be additional SIDS data on decane and tetradecane in Italy and has requested this additional information for inclusion in the dossiers and other SIDS documents.

The IHSC understands that tetradecane is among the "category" of "orphan" chemicals proposed by EPA for the 55th TSCA Interagency Testing Committee (ITC) Priority Testing List. Because tetradecane is a chemical sponsored in the ICCA Initiative, the IHSC requests that tetradecane be removed from consideration by the ITC for the 55th Priority Testing List. Data generated on tetradecane under the SIDS program will fulfill the SIDS data needs of the Agency. I would appreciate your written confirmation that tetradecane will be removed from the 55th ITC Priority Testing List, and that it is no longer considered an "orphan" in the HPV Challenge Program.

